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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL**

**Petitioners,**

**v.**

**SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715**

**Respondent.**

**Case No: C-07-CV-05158-JF**

**JOINT PROPOSED DISCOVERY  
PLAN**

**Judge: Hon. Jeremy Fogel**

Pursuant to Federal Rule of Civil Procedure 26(f), a meeting was held in December 2007,  
via telephone and was attended by Laurence R. Arnold for Petitioners Stanford Hospital &  
Clinics and Lucile Packard Children's Hospital (the "Hospitals") and by Vincent A. Harrington,  
Jr. for Respondent Service Employees International Union, Local 715 (the "Union"). The Parties  
hereby respectfully submit their Joint Proposed Discovery Plan.

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1 **I. PRE-DISCOVERY DISCLOSURES**

2 Under Federal Rule of Procedure 26(a)(1)(E), this action is exempt from the requirement  
3 of Rule 26(a) pre-discovery disclosures.

4 **II. DISCOVERY PLAN**

5 The Parties anticipate that this case will be resolved by means of a dispositive motion.  
6 The Parties further believe that all evidence that will be relied upon in the resolution of that  
7 motion is already in the possession of both of the Parties. To the extent that either party requires  
8 additional evidence from the other for the resolution of the motion, the Parties will make  
9 arrangements for an informal exchange of such evidence, and believe that this will eliminate the  
10 need for formal discovery in this case.

11 In the absence of stipulations, or in the event that the Parties cannot reach informal  
12 agreement concerning the exchange of evidence, the Parties intend to utilize formal discovery  
13 procedures, including interrogatories, requests for admissions, requests for production of  
14 documents, and depositions. Additionally, in the absence of a stipulation, the Union intends to  
15 utilize Requests for Admissions to establish the dates of the filing and service of the Petition, and  
16 the arguments presented by the parties to the Arbitrator.

17 The Parties propose that, in the event that the case has not been resolved by dispositive  
18 motion by June, 15, 2008, that the Parties submit a revised discovery plan at that time.

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20 Dated: March 14, 2008

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24 By: 

EILEEN R. RIDLEY  
Attorneys for Petitioners  
Stanford Hospital & Clinics and Lucile  
Packard Children's Hospital

1 Dated: March 14, 2008

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